PLAINTIFF'S EXHIBIT
ETCO-568

ETHYL CORPORATION

INTER-OFFICE

To D. G. Coates — Address Houston Plant

From P. J. Sanders — Address Houston Plant

Subject Insulation Removal - Na Building — Date January 29, 1979

On January 16 and 17, I conducted personnel monitoring during the removal of an insulated line used to transfer sodium from the #1 filter to the weigh tank and the stripping and cleanup of the insulating material. Considering that the insulation may contain asbestos fibers, it was to be handled as asbestos. These samples, as well as bulk samples from this and two other similar lines, have been submitted for analysis. A supplement to this memo will be sent when results are available. Comments based on personal observation of this procedure follow.

1. Employees in all three crafts involved in the procedure used a 3M Model 9910 disposable dust respirator that has a NIOSH approval for asbestos. This practice is commendable and should be applied whenever there is a reason to believe asbestos is present.

   During the first step of the removal procedure, none of the employees used the disposable coveralls that were purchased for this purpose. In my judgment, at least the two carpenters who were using saws to cut the insulation should have used them. A significant amount of dusting occurred during the sawing and their clothing was covered by it. On the second day, the coveralls were used during the stripping and clean up operation.

2. To whatever degree possible, the insulation should be handled in a wet state. This is required by the OSHA regulation. The initial removal of small segments of the insulating material was done dry. In this particular case, some consideration must be given to the possible presence of active sodium in making the decision of how best to handle the material.

   The insulated sections of pipe had been stored outside during the night prior to stripping. The material was wet (due to a rain storm) where it was stripped from the line and dusting was minimal. The choice of such a remote spot and wet handling is commendable.

3. Clean up of the area should not be delayed any longer than necessary, especially in a high traffic area such as this. The larger pieces of insulating material were

picked up almost immediately. However, the small pieces and the dust were not cleaned up for ~24 hours. It is this type of material that may become readily airborne and spread to other areas. The best means of removal of the fines would be by vacuuming. If we do not presently have a dry/wet vacuum on site, we should obtain one. The use of the sweeping compound did have a positive effect on keeping dusting to a minimum.

The scrap material was placed in plastic bags, as described in the handling procedure. On the first morning, however, the bags were transported unsealed to another area of the sodium building. In order to limit contamination to as small an area as possible, the bags of scrap should always be sealed before taking it out of the work area.

4. In the written handling procedures, the asbestos hazard is described only as a lung irritant. Asbestos is a known human carcinogen and we are required to inform workers of the hazards to which they are exposed. The instructions should be reworded to accurately describe the hazard.

If you wish to discuss this or if I may be of assistance, please call.

P. J. Sanders

PJS:bto

cc: W. F. Armstrong/A. O. Wikman
J. G. Burdick/G. B. Meyers
C. B. Hunt
C. J. Lowe
R. L. Mack
J. D. Roper
J. T. Rucker
G. L. Ter Haar
File: Operations - Houston